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Attorneys for Defendants Colony Capital, Inc.  
(f/k/a Colony NorthStar, Inc.), Richard B.  
Saltzman, Darren J. Tangen, and David T.  
Hamamoto

[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

BRIAN BARRY, Individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

COLONY NORTHSTAR, INC.,  
RICHARD B. SALTZMAN, DARREN J.  
TANGEN, and DAVID T. HAMAMOTO,

Defendants.

Case No. 2:18-cv-02888-GW-MRW

**JOINT STIPULATION TO ENTER  
FINAL JUDGMENT**

[Proposed] Order of Final Judgement  
Filed Concurrently

Judge: Hon. George H. Wu  
Courtroom: 9D

1 Pursuant to Rule 7.1 of the Local Civil Rules for the United States District  
2 Court for the Central District of California, plaintiff Teamsters 710 Local Pension  
3 Fund (“Lead Plaintiff”), individual defendants Richard B. Saltzman, Darren J.  
4 Tangen, and David T. Hamamoto, and defendant Colony Capital, Inc. (f/k/a Colony  
5 NorthStar, Inc.) (“Defendants”, collectively with Lead Plaintiff, “Parties”), by and  
6 through their respective attorneys, jointly state and move as follows:

7 WHEREAS, on February 21, 2020, the Court granted Defendants’ Motion to  
8 Dismiss the Third Amended Complaint in its entirety and dismissed Lead  
9 Plaintiff’s entire action with prejudice (Dkt. No. 97) for the reasons set forth in the  
10 Court’s Tentative Ruling (Dkt. No. 96);

11 WHEREAS, the February 21, 2020 order disposed of every claim against  
12 Defendants;

13 WHEREAS, 15 U.S.C. § 78u-4(c) provides that “upon final adjudication of  
14 the action, the court shall include in the record specific findings regarding  
15 compliance by each party and each attorney representing any party with each  
16 requirement of Rule 11(b) of the Federal Rules of Civil Procedure as to any  
17 complaint, responsive pleading, or dispositive motion”; and

18 WHEREAS, Federal Rule of Civil Procedure 54 provides that “[u]nless a  
19 federal statute, these rules, or a court order provides otherwise, costs – other than  
20 attorney’s fees – should be allowed to the prevailing party.”

21 **IT IS HEREBY STIPULATED**, by and between the undersigned parties,  
22 that:

23 1. Final judgment shall be entered against Lead Plaintiff in this action  
24 and in favor of Defendants pursuant to Federal Rules of Civil Procedure 58 and 79,  
25 in the form of the Proposed Judgment submitted concurrently;

26 2. Each of the Parties, and his or its attorneys of record, complied with  
27 the requirements of Rule 11 of the Federal Rules of Civil Procedure at all times in  
28 this action;

1           3.     Lead Plaintiff hereby agrees to waive all rights to appeal this order, the  
2 February 21, 2020 order (Dkt. No. 97), and any other order in this action; and

3           4.     Each of the Parties shall bear his or its own attorneys' fees and costs  
4 incurred in connection with this action.

5           **IT IS SO STIPULATED.**

6  
7 Dated: March 24, 2020

Daniel M. Petrocelli  
Matthew W. Close  
Brittany Rogers  
O'MELVENY & MYERS LLP

8  
9 By: /s/ Matthew W. Close  
10 Matthew W. Close

11 Attorney for Colony Capital, Inc. (f/k/a Colony  
12 NorthStar, Inc.), Richard B. Saltzman, Darren J.  
13 Tangen, and David T. Hamamoto

14 Dated: March 24, 2020

15 Spencer A. Burkholz  
16 Douglas R. Britton  
17 Juan Carlos Sanchez  
18 ROBBINS GELLER RUDMAN & DOWD  
19 LLP

20 By: /s/ Douglas R. Britton  
21 Douglas R. Britton

22 Counsel for Lead Plaintiff Teamsters 710  
23 Local Pension Fund  
24  
25  
26  
27  
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**SIGNATURE ATTESTATION**

I hereby attest that the other signatories listed, on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: March 24, 2020

**O'MELVENY & MYERS LLP**

By: /s/ Matthew W. Close  
Matthew W. Close

Attorney for Colony Capital, Inc. (f/k/a  
Colony NorthStar, Inc.), Richard B.  
Saltzman, Darren J. Tangen, and David T.  
Hamamoto